

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

HIND OMAR,

Plaintiff,

Case No. 23-cv-11689

Hon. George Carem Steeh

v.

BOARD OF GOVERNORS OF WAYNE
STATE UNIVERSITY, in their individual
and official capacity,

Defendant.

David A. Nacht (P47034)

Amanda M. Ghannam (P83065)

NACHTLAW, P.C.

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**STIPULATION TO EXTEND EXPERT DISCLOSURE, DISCOVERY,
AND THE DISPOSITIVE MOTION DEADLINE**

Plaintiff Hind Omar and Defendant Board of Governors of Wayne State University, through their respective counsel, stipulate and request to amend the Scheduling Order entered by the Honorable George Caram Steeh, United States District Judge, Eastern District of Michigan, and to respectfully request an extension of the following deadlines:

- The time for Plaintiff's expert disclosure shall be extended from March 13, 2024 to June 5, 2024.
- The time for all discovery in this case to conclude shall be extended from April 24, 2024 to July 24, 2024.
- Time for the filing of all dispositive motions shall be extended from May 24, 2024 to August 28, 2024.

This is the first time the parties have requested expert disclosure, discovery, and disposition motion deadlines be extended. The parties request this extension because despite diligently engaging in written discovery, they have been unable to schedule depositions based on the parties' schedules and Plaintiff welcoming a new child into her family. The parties are continuing written discovery and anticipate being able to conduct depositions from April through July 24, 2024.

The parties have attached a proposed order as Exhibit A.

Respectfully submitted,

NachtLaw, P.C.

Butzel Long

By: s/ with consent of David A. Nacht
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**ORDER EXTENDING EXPERT DISCLOSURES, DISCOVERY,
AND THE DISPOSITIVE MOTION DEADLINE**

This matter having come before the Court upon the Stipulation of Plaintiff Hind Omar and Defendant Board of Governors of Wayne State University, and pursuant to L.R. 7.1 and this Court's Practice Guidelines, for entry of the proposed Order Extending Discovery and the Dispositive Motion Deadline; and the Court being otherwise fully informed:

IT IS ORDERED:

1. Deadline for Plaintiff's expert disclosure shall be extended from March 13, 2024 to June 5, 2024 (Defendant's Expert Disclosures due within 30 days after receipt of Plaintiff's expert's report).

2. Deadline for all discovery in this case to conclude shall be extended from April 24, 2024 to July 24, 2024.

3. Deadline for the filing of all dispositive motions shall be extended from May 24, 2024 to August 28, 2024.

Dated: March 12, 2024

s/George Caram Steeh
United States District Judge